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July 25, 2023

VIA ECF

Hon. Cathy L. Waldor
United States Magistrate Judge
United States District Court
District of New Jersey
Martin Luther King Courthouse
50 Walnut Street
Newark, New Jersey 017102

Re: **Johnson & Johnson Health Care Systems, Inc. v. Save On SP, LLC,**
Civil Action No. 22-2632 (ES)(CLW)

Your Honor:

As you are aware, this law firm in association with Selendy Gay Elsberg PLLC represents defendant Save On SP, LLC (“SaveOnSP”), in the above-referenced matter. I write to present SaveOnSP’s request for an extension of time in which to file SaveOnSP’s anticipated Motion to Seal a letter dated June 19, 2023 (the “June 19 Letter”) which appears now under temporary seal at ECF No. 119. Counsel for Plaintiff Johnson & Johnson Health Care Services, Inc., have kindly consented to this relief.

There is pending before Your Honor a Motion to Seal by SaveOnSP that appears at ECF No. 117. Your Honor previously granted two extensions of time [ECF Nos. 126, 130] to file subsequent motions to seal until two weeks following the Court’s decision on ECF No. 117. The June 19 Letter [ECF No. 119] relates to the same subject matter as ECF No. 109, which is the subject of the motion to seal that appears at ECF No. 117. Your Honor, by Order dated June 20, 2023 [ECF No. 120], however, set the due date for the Motion to Seal the June 19 Letter [ECF No. 119] as July 14, 2023. We now respectfully request that the Court grant a similar extension with respect to the motion to seal the June 19 Letter [ECF No. 119], making it also due two weeks after the Court rules on sealing ECF 117, and order that document ECF No. 119 remain under temporary seal pending further Order of the Court.

Of course, the time specified under the Court’s June 20, 2023 Order [ECF no. 120] has expired, although the document in question [ECF No. 119] remains under temporary seal as of this

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writing. Counsel for SaveOnSP were under the mistaken impression that the other extensions granted by the Court included ECF No. 119, and we overlooked the clear direction to the contrary in the Order at ECF No. 120. We apologize for that oversight. If the Court grants this application, however, each of the Motions to Seal subsequent to ECF No. 117 will be due on the same date. Furthermore, those subsequent Motions will likely be informed by the Court's disposition of the earlier Motion [ECF No. 117]. We respectfully suggest, therefore, that the extension proposed in this letter is the most efficient way to proceed.

If the foregoing meets with the Court's approval, we ask that Your Honor endorse this letter as 'So-Ordered' and place it on the electronic docket of the Clerk of the Court. We thank Your Honor for your kind attention to this request. Please do not hesitate to have the Court's staff contact me with any questions or if we may be of any service whatsoever to the Court.

Respectfully submitted,

/s/ E. Evans Wohlforth, Jr.

E. Evans Wohlforth, Jr.

cc: All Counsel of Record (*via* ECF)